

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
5001 Southgate Drive, P.O. Box 36800
Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 10, 2005

EMAIL TRANSMISSION – 6/10/05
Information Bulletin No. MT-2005-051

To: Field Manager, Miles City Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/15/2005

Field Offices are requested to provide an update on the status of corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits. This request is for an update of the following information: 1) the status of corrective action for each incomplete finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

Attachment 1 is the request for information from Archer, Inc., the CASHE contractor. It provides general explanations, instructions, and gives the preferred format that is to be used in your response. It is critical that you use their descriptions to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)
- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

Attachment 2 lists findings for your office that are not complete based on your last status report to the contractor.

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than Friday, July 15, 2005. A consolidated response will be sent to the contractor by July 29, 2005.

If you have any questions, please contact Karilynn Volk, at 406-896-5190.

Signed by: Diane M. Friez, for Sandra C. Berain

Authenticated by: Aleta Zahorodny (MT-930)

2 Attachments

- 1-Aarcher Memorandum, 05/31/2005, CASHE Findings Status Update 2005 – Instructions (8 pp in its entirety)
- 2-Miles City Field Office CASHE Findings (2 pp)

cc:

(MT-020), Donna Bradley, CDSO
(MT-020), Bea Knudson, CDSO
(MT-020), Dex Hight, Hazardous Material Coordinator
(MT-024), Linda Reder, AO



MEMORANDUM

To: State Safety Managers, State HAZMAT Coordinators, and National Centers' CASHE Points of Contact (POC)

From: Bonnie Wisniewski, Aarcher, Inc.

Date: May 31, 2005

Re: CASHE Findings Status Update 2005 - Instructions
Responses from each State CASHE POC are due by July 29, 2005

Aarcher, Inc. has been tasked to obtain the current status of all CASHE findings identified between October 1993 and February 2005. Attached to this email are Microsoft Word documents summarizing all open CASHE findings identified in your State during that timeframe and a copy of this memo. **Please provide this memo to the Field/District Offices with their findings.** *[Note: There is not necessarily a document for every audited facility because this effort only involves reporting on open findings (i.e., some facilities have completed all corrective actions related to past CASHE findings). See the Attachment for facilities with no open findings that are not getting update requests.]*

The documents only reflect findings that are not complete based on the last reported status. If a scheduled date of completion has passed, a finding is not considered complete until that fact is reported back to Aarcher. The last reported status was either provided in the final report, in draft report comments, or in response to the 2004 status update request, which ever is most recent.

Findings may be considered completed without all corrective actions implemented under one of the following conditions:

- 1) If a properly completed Hazard Abatement Plan is prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management [Note: if an office or center indicates a finding is completed because a Hazard Abatement Plan has been prepared, a copy of the abatement plan must be submitted with the completed CASHE Status Update spreadsheet. Failure to provide a properly completed abatement plan will result in those findings being listed as incomplete.]; or**
- 2) If the corrective action is under design or is programmed for construction during the current or next fiscal year.**

The documents also include findings from recently conducted assessments for which Aarcher has not yet received comments (points of contact and status of corrective action). Please advise the field that if this is their circumstance, the response to this status update request can also serve as their comments on the draft report and Aarcher will incorporate them into the final CASHE report.

As you are aware, the FY 2001 BLM Annual Performance Plan, Long-term Goal 01.04.01, calls for increasing the percentage of BLM organizational units in “good safety, health, and environmental condition.” The Government Performance and Results Act (GPRA) requires all Federal agencies to establish measurable and verifiable performance goals and to report on those goals annually. The results of the update will be tabulated by Aarcher, Inc. and used by the WO to report on Long-term Goal 01.04.01. Please contact Ken Morin, BLM CASHE Program Lead, for additional information on how the updated CASHE finding data will be reported internally at BLM.

The findings are being sent to State Safety Managers, State HAZMAT Coordinators, and National Centers' CASHE Points of Contact, as opposed to directly to the field. This is to ensure that the appropriate Field/District Office personnel receive them and that all organizational units respond.

This request is for an update of the following information, where applicable:

- 1) The status of each finding (see the preferred format for the status information in the definitions below);
- 2) The point(s) of contact (full names of BLM individuals; not a program, committee, office, or building owner); and
- 3) Facility name changes.

Each Word document represents a section of a CASHE report and has been assigned a file name representing such. For example, a CASHE report for a Field Office in Colorado may have had three sections: Blue Field Office, Blue Field Office Recreation Sites, and Blue Field Office Fire Facilities. The associated files for the findings in these sections are named *CO BlueFO.doc*, *CO BlueRec.doc*, and *CO BlueFire.doc*.

For those who respond electronically, **it is imperative that the files are not renamed or converted to a different software**, as file integrity is critical to Aarcher's ability to track the data. Electronic modification, software conversion, and renamed files result in lost data. Modified files will be rejected and the State Safety Managers, State HAZMAT Coordinators, and the Centers' CASHE Points of Contact will be contacted in an effort to obtain the data in the correct format. If the field prefers not to respond electronically, they should print the documents, update them by hand, and mail them to Aarcher.

The following is a list of the data fields provided for the findings and definitions of the information contained in them.

Header Information - The organizational unit and assessed facility(s) (i.e., report section).

Finding Number - The unique code assigned to the finding (Protocol Abbreviation - Assessment Year - Sequential Number).

Finding - The identified compliance deficiency.

Date of Final Report - The date the of the final CASHE report where the finding was documented. For findings that have not yet been provided in a final report, this field is blank. Facilities that have had multiple CASHE audits will have sets of findings sorted by final report date. [**Note:** It is important for facilities to comment on all sets of findings because every finding identified in a previous report is not necessarily repeated in subsequent reports. This is based on a number of factors, including changes in the CASHE approach, that the same facilities are not always inspected on the follow-up, regulations have changed, etc. In addition, a previous finding may not have been identified in a subsequent report; however, a point of contact is still relevant.]

Repeat? - An indication (Yes or No) of whether the finding is a repeat from a previous CASHE. For facilities that have not had a CASHE, "N/A" has been entered.

Priority Level - The class of finding (IA, IB, IC, II, III) based on the level of violation. All findings identified prior to February 2001 were assigned Priority Levels. After February 2001, Priority Levels were no longer assigned to safety findings; therefore, for safety findings identified after February 2001, "N/A" has been entered in this field.

Safety RAC - The Risk Assessment Code (RAC) assigned to safety findings based on BLM Manual Handbook 1112-I, Safety and Health Management. The CASHE Program began assigning Safety RACs in February 2001. For findings identified prior to that, "N/A" has been entered. For environmental and transportation findings identified after February 2001, "N/A" has been entered in this field.

Recommendation - Corrective actions suggested by the CASHE Team based on the specific conditions at the facility, costs, and regulatory requirements.

Point(s) of Contact - The name of the BLM personnel who are acting as point of contact (POC) for the corrective action as provided in the final report, draft report comments, or in response to the 2004 status update request, which ever is most recent. Where information was not provided to the status update last year or it has not yet been received on a draft report, "Not provided" has been entered. **The field is requested to update this field with the full name(s) of current POCs (e.g., not a program, committee, office, or building owner).** If names are not provided, "Not provided" will be entered.

Last Reported Status - The status of the corrective action as provided in the final report, draft report comments, or in response to the 2004 status update request, which ever is most recent. When no information was provided to the status update last year or it has not yet been received on a draft report, "Not provided" has been entered.

Current Status - This field has been left blank for facilities to provide updated status information. Facilities are requested to provide the current status information in a format similar to the examples below. **A finding may be reported as complete if a Hazard Abatement Plan for that finding has been prepared, approved by management, and a copy provided with the status update response.**

- Unscheduled
- Completed in [date if available]
- Implemented in [date if available]
- Scheduled for completion by [date]
- Funding requested; anticipate completion by [scheduled date of completion]
- Preliminary planning; anticipate completion by [scheduled date of completion]
- Under design; anticipate completion by [scheduled date of completion]
- Under construction; anticipate completion by [scheduled date of completion]
- N/A (e.g., if no longer relevant because a facility no longer exists).

[Note: If a finding is no longer relevant, please explain why. Additionally, findings are not considered complete unless completion is explicitly stated in the response.]

Please provide the findings and these instructions to relevant facility personnel (Field Office Managers, HAZMAT Coordinators, Safety Officers). Please request that respondents coordinate their update with others to ensure no findings are skipped, as many findings overlap program areas; and that **all responses be consolidated and submitted to the CASHE POC in their State (see list of State CASHE POCs below).**

State CASHE POCs

Alaska – unassigned (contact State Safety Manager or State HAZMAT Coordinator for POC)
Arizona - Bill Huntington
California - Jim Anger
Colorado – unassigned (contact State Safety Manager or State HAZMAT Coordinator for POC)
Eastern States – unassigned (contact State Safety Manager or State HAZMAT Coordinator for POC)
Idaho - Jan Peterson
Montana - Karilynn Volk
New Mexico – unassigned (contact State Safety Manager or State HAZMAT Coordinator for POC)
Oregon - Jim Chandler
Utah - Lowell Jeffcoat
Wyoming – unassigned (contact State Safety Manager or State HAZMAT Coordinator for POC)
NIFC - Stan Palmer
NTC - David Trimm
National Centers Denver - Vickie Smejkal
Washington Office - Phyllis McKoy

Responses that are not consolidated; or that are incomplete, illegible, or not in the requested format will be rejected. This approach is in accordance with Aarcher's guidance from Ken Morin, BLM CASHE Program Lead.

Responses from each State CASHE POC must be returned to Aarcher no later than **July 29, 2005**. Responses may be emailed or mailed to the following (**no faxes, please**):

AARCHER, INC.
ATTN: Bonnie Wisniewski
14 Inverness Drive East
Suite F-240
Englewood, CO 80112
303-662-1696
bwisniewski@aarcherinc.com

If you have any questions, please do not hesitate to call me at 303-662-1696. Thank you for your assistance.

ATTACHMENT

Facilities with no open findings as of February 2005 (not receiving update requests)

<u>ALASKA</u> ANCHORAGE FIELD OFFICE Campbell Creek Science Center GLENNALLEN FIELD OFFICE Glennallen Joint-use Facility NORTHERN FIELD OFFICE Field Office Arctic Management Area Northwest Management Area <u>ARIZONA</u> SAFFORD FIELD OFFICE Field Office Safford Recreation Sites <u>CALIFORNIA</u> CALIFORNIA STATE OFFICE State Office ARCATA FIELD OFFICE Field Office FOLSOM FIELD OFFICE Field Office NEEDLES FIELD OFFICE Field Office UKIAH FIELD OFFICE AUTHORIZED USER US Geological Survey	<u>COLORADO</u> WESTERN SLOPE CENTER Center / Uncompahgre Field Office Upper Colorado Interagency Fire GLENWOOD SPRINGS FIELD OFFICE Field Office GUNNISON FIELD OFFICE Field Office ROYAL GORGE FIELD OFFICE/ FRONT RANGE CENTER Monte Vista Detached Front Range Center Mancos/Delores Field Office Columbine Field Office SAN JUAN PUBLIC LAND CENTER Center Office Anasazi Heritage Center <u>EASTERN STATES</u> JACKSON FIELD OFFICE Field Office <u>IDAHO</u> COTTONWOOD FIELD OFFICE Field Office IDAHO FALLS FIELD OFFICE Idaho Falls Fire Cache Pocatello Air Tanker Base Upper Snake River District Fire Facilities JARBIDGE FIELD OFFICE Field Office POCATELLO FIELD OFFICE AND MALAD FIELD STATION Field Office SALMON OFFICE Office SHOSHONE FIELD OFFICE Field Office
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<u>MONTANA</u> MONTANA STATE OFFICE State Office Oil and Gas Field Station Montana Eastern Zone Interagency Operations Center BILLINGS FIELD OFFICE Field Office Pompey's Pillar MISSOULA FIELD OFFICE Field Office <u>NEVADA</u> NEVADA STATE OFFICE State Office NEVADA STATE OFFICE AUTHORIZED USER Fish and Wildlife and Geological Survey Facilities BATTLE MOUNTAIN FIELD OFFICE Tonopah Field Station ELKO FIELD OFFICE Field Office ELY FIELD OFFICE Field Office <u>NEW MEXICO</u> ALBUQUERQUE FIELD OFFICE Field Office Cuba Field Station CARLSBAD FIELD OFFICE Field Office and Hobbs Field Station ROSWELL FIELD OFFICE Roswell Resource Area Office Roswell Tanker Base Hobbs Detached Field Office Midway Fire Operations Center	<u>OREGON</u> OREGON STATE OFFICE State Office BURNS DISTRICT Burns Recreation Facilities COOS BAY DISTRICT District Office Myrtlewood Resource Area Umpqua Resource Area EUGENE DISTRICT Tyrell Seed Orchard Eugene Road Maintenance Shops West Eugene Wetlands Project Office PRINEVILLE DISTRICT Prineville Fire Guard Stations SALEM DISTRICT District Office Salem Recreation Areas Salem Road Maintenance Shops Tilamook Resource Area Walter H. Horning Tree Seed Orchard SPOKANE DISTRICT District Office Wenatchee Resource Area VALE DISTRICT District Office Baker Field Office Oregon Trail Interpretive Center Vale Fire Guard Stations <u>UTAH</u> FILLMORE FIELD OFFICE Field Office RICHFIELD FIELD OFFICE Henry Mountain Field Station SALT LAKE FIELD OFFICE Salt Lake Field Stations Salt Lake Interagency Fire Center Salt Lake Fire Camps VERNAL FIELD OFFICE Field Office
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<u>WASHINGTON</u> WASHINGTON OFFICE Office Facilities NATIONAL CENTERS Center Facilities NATIONAL INTERAGENCY FIRE CENTER National Fire Program (1)	<u>WYOMING</u> BUFFALO FIELD OFFICE Field Office CODY FIELD OFFICE Field Office KEMMERER FIELD OFFICE Field Office PINEDALE FIELD OFFICE Field Office RAWLINS FIELD OFFICE Rawlins Sign Shop ROCK SPRINGS FIELD OFFICE Field Office (1) WORLAND FIELD OFFICE Worland Shop and Laboratory
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Montana

Organizational Unit: Miles City Field Office
Assessed Facility: Miles City Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
GEC-04-002	No washing facilities are available at the Eastern Montana Fire Zone Air Operations hangar.	03/15/2005	No	N/A	4	Provide proper lavatory facilities for the hangar as outlined in the above discussion.	Greg Loper	Scheduled to be completed by the end of fiscal year 2005.	
SARA-04-001	SEAT base personnel interviewed by the CASHE Team are unsure if the facility has informed the State Emergency Response Commission (SERC) that they are storing hazardous materials above the hazardous chemical reporting threshold in EPA's Emergency Planning and Community Right-to-Know regulations.	03/15/2005	Yes	Class IC	N/A	A) Determine what, if any, EPCRA reporting the MTDC is doing for the base; B) Determine what, if any, reporting the Fire-Trol contractor is providing; C) If either are conducting reporting on behalf of the base, request and maintain copies of all reports; D) If the required reporting is not being conducted by others, submit MSDSs and a Tier I form for the PhosChek and Fire-Trol (including ammonia above its TPQ); and E) Submit the Tier I form annually.	Dex Hight	Scheduled for completion on November 15, 2004.	
WW-04-001	SEAT Base personnel stated that discharges are not covered by a Montana Pollutant Discharge Elimination System (MPDES) permit.	03/15/2005	Yes	Class IB	N/A	A) Contact the State, obtain and complete an NPDES storm water permit application, and coordinate permitting efforts with the airport; B) Implement best management practices and other terms and conditions stipulated in the MPDES; C) Contract for preparation of storm water pollution prevent plan (SWPPP); D) Implement recommendations and best management practices recommended in the SWPPP; and E) Maintain copies of all correspondence and permits at the SEAT Base and/or Field Office.	Not provided. This finding was added to the final report.	Not provided. This finding was added to the final report.	

Montana

Organizational Unit: Miles City Field Office
Assessed Facility: Fort Howes Work Center

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
SPCC-01-001	A Spill Prevention, Control, and Countermeasures (SPCC) Plan has not been prepared and implemented for Fort Howes.	11/12/2001	N/A	Class IC	N/A	Request the Forest Service to do the following: A) Prepare and implement an SPCC Plan; and B) Provide required spill response equipment; and C) Provide training on the plan.	Robert LaPlant, Dex Hight	Not complete as confirmed during the 2004 CASHE audit.	
SPCC-01-002	The aboveground storage tanks (AST) located at Fort Howes are not equipped with all of the required spill prevention and safety features.	11/12/2001	N/A	Class IB	N/A	Request the Forest Service to do the following: A) Install a whistling vent alarm; B) Contact the Fire Marshall to provide written approval of the tanks as they are currently equipped (i.e., without the high-level alarm or positive shutoff valve); and C) If the Fire Marshall will not provide a written permit for the tanks as they are currently equipped, install the required devices.	Robert LaPlant	Not complete as confirmed during the 2004 CASHE audit.	